



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 W. 15th STREET, SUITE 3200
HELENA, MONTANA 59626

Ref: 8MO

December 14, 2004

Jo Ann Griffith
USEPA Headquarters
Ariel Rios Bldg., Mailcode 5202G
1200 Pennsylvania Ave, N. W.
Washington, DC 20460

Dear Ms. Griffith:

This letter responds to the National Remedy Review Board recommendations for the Butte Priority Soils Operable Unit (BPSOU) of the Silver Bow Creek/Butte Area Superfund Site. The Board made nine recommendations which are contained in a letter to Region 8 dated September 8, 2004. The following numbered responses are in the order presented in the Board's September 8, 2004 letter. Also, enclosed is a copy of the Proposed Plan which will be released to the public on December 20, 2004.

1. The Region has provided language in the Proposed Plan under the section *Residential Areas*, page 43, which describes more exactly the nature of the multi-pathway approach, and identifies the voluntary, non-Superfund aspects of that plan.
2. Additional information beyond that contained in the remedy review board package concernin the Region's derivation of lead, arsenic, and mercury action levels has been added on pages 21 and 22 of the Proposed Plan.
3. EPA Region 8 did not establish numeric remedial goals for stream sediment at BPSOU. Rather, EPA Region 8 used a weight-of-evidence approach during the Baseline Ecological Risk Assessment to estimate sediment toxicity and to support the preferred remedial action related to sediments. This approach utilized literature benchmark values, regional toxicity studies, and site-specific ecological surveys as toxicity reference values (TRVs) to assess the concentrations of metals in stream sediment. Based on these multiple lines of evidence, EPA Region 8 determined that arsenic and metal concentrations in sediment in the short reach of unremediated Silver Bow Creek from the mouth of the Metro Storm Drain to the reconstructed stream channel in Lower Area One are toxic to aquatic life and require removal under the preferred alternative. Following removal, water quality and stream sediment data will be collected under the Final Monitoring Plan to ensure that water quality goals are met. EPA Region 8 added a bullet on page 24 of the proposed plan to identify the ecological risks posed by sediments. A similar bullet was also added on page 26 to state the remaining risks posed by sediments and the extent of the

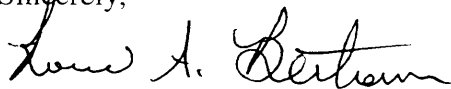


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found that a TI waiver of the ground water ARAR for achieving MCLs is necessary and appropriate as indicated in the response above. EPA Region 8 will remove the subject RAO from the Proposed Plan and will not include it in the final decision document.

If you have any questions, please contact me at 406 457-5043.

Sincerely,

A handwritten signature in black ink, appearing to read "Ronald A. Bertram". The signature is fluid and cursive, with the first name "Ronald" being more prominent.

Ronald A. Bertram
Remedial Project Manager

Enclosure

cc: John F. Wardell, 8MO
Charles S. Sands, EPA HQ, 5204G
Dale Vodehnal, 8EPR-SR
Bob Fox, 8MO
Henry Elsen, 8MO
Sara Sparks, 8MO
Wendy Thomi, 8MO